1 2 3 4 5 6 7	Jennifer D. Brandt, Texas Bar No. 00796242 Attorney for Plaintiff Phone: 817-978-6442 Fax: 817-978-4927 Jason C. Rodgers, Texas Bar No. 24005540 Securities and Exchange Commission Fort Worth District Office Burnett Plaza, Suite 1900 801 Cherry Street, Unit #18 Fort Worth, TX 76102-6882	
8 9	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
1011	SECURITIES AND EXCHANGE COMMISSION,	
12	Plaintiff, v.	
13 14 15 16 17 18 19 20 21 22 23 24 25	KING CHUEN TANG a/k/a CHEN TANG, RONALD YEE, ZISEN YU, JOSEPH SETO, MING SIU, KING S. TANG a/k/a JAMES K. TANG, and YING KIT YU a/k/a EDDIE YU, Defendants, and VENTURE ASSOCIATES FUND I, TANG CAPITAL PARTNERS, ACCELERATION CAPITAL PARTNERS, AMERICAN PEGASUS LONG SHORT FUND SEGREGATED PORTFOLIO, PING LEE TANG, KA LING LEE, YIN LEE KA, CHEUNG-TING KA, SYLVIA TSUI, DOI PING SIU, YUEN-LAI MA, LEUNG-KEE SIU, ROSALIE CHO, and MINOR CHILD I and MINOR CHILD II, minor children of Defendant King Chuen Tang a/k/a Chen Tang, Relief Defendants.	Case No. 3:09-cv-05146-JCS STIPULATION AND [PROPOSED] ORDER EXTENDING FACT DISCOVERY DEADLINE Judge: Hon. Joseph C. Spero Date Comp. Filed: October 30, 2009 Trial Date: February 13, 2012
2627		
28		

1	WHEREAS, on May 17, 2011, the Court issued a Further Case Management and Pretrial		
2	Order setting August 1, 2011 as the deadline to complete non-expert discovery (Dkt. No. 161);		
3	WHEREAS, two defendants are scheduled to change their pleas (<i>i.e.</i> , enter guilty pleas)		
4	in the parallel criminal case on September 8;		
5	WHEREAS, the schedules of the parties and witnesses have rendered it highly difficult		
6	to complete the depositions of various defendants and third-party witnesses within the allotted		
7	time;		
8	WHEREAS, the parties respectfully submit that it is therefore in the interest of the		
9 10	parties to extend the non-expert discovery cutoff date until September 30, 2011; and		
11	WHEREAS, extending the non-expert discovery cutoff date until September 30, 2011		
12	would not have any effect on any other deadlines set by this Court;		
13			
14	IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1(b), 6-2(a) and 7-12,		
15	by and between the undersigned counsel for the Parties, that:		
16	1. The cutoff date related to non-expert discovery is extended until September 30,		
17	2011.		
18	2. All other dates set pursuant to the Court's Further Case Management and Pretrial		
19	Order of May 17, 2011 shall remain in place.		
20	Respectfully submitted,		
21			
22	Dated: August 24, 2011 /s/ Jennifer D. Brandt Jennifer D. Brandt, Esq.		
2324	Counsel for Plaintiff Securities and Exchange Commission		
25			
26	Dated: August 24, 2011 /s/ Jahan P. Raissi Jahan P. Raissi, Esq. Counsel for Defendant King Chuen Tang		
27	a/k/a Chen Tang and Relief Defendants, Tang Capital Partners, Venture Associates Fund I,		
28	Minor Child I and Minor Child II, Ping Lee		
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Casse 3: 09-cv-05146-JCS Document 16'9 Filed 08/25/11 Page 3306 144

1		Tang, Ka Ling Lee, Yin Lee Ka, and Cheung- Ting Ka
2	Dated: August 24, 2011	/s/ Jay Pomerantz
3		Jay Pomerantz, Esq. Counsel for Defendant Ming Siu and Relief
4		Defendants Sylvia Tsui, Doi Ping Siu, Yuen-Lai Ma, and Leung-Kee Siu
5	Dated: August 24, 2011	/s/ Ismail Ramsey
6		Ismail Ramsey Counsel for Defendant Zisen Yu and Relief
7		Defendant Acceleration Capital Partners
8	Dated: August 24, 2011	/s/ Christopher J. Cannon
9		Christopher J. Cannon, Esq. Counsel for Defendant Joseph Seto
10	Dated: August 24, 2011	/s/ Alan W. Sparer Alan W. Sparer, Esq.
11		Counsel for Relief Defendant American
12		Pegasus Long Short Fund Segregated Portfolio
13	Dated: August 24, 2011	/s/ Thomas Brown Thomas Brown, Esq.
14		Counsel for Defendant King S. Tang a/k/a James S. Tang and Relief Defendant Rosalie Cho
15	Dated: August 24, 2011	/s/ Michael Celio
16		Michael Celio, Esq. Counsel for Defendant Ronald Yee
17		Counsel for Defendam Ronald Tee
	Dated: August 24, 2011	/s/ Hugh Levine Hugh Levine, Esq.
18		Counsel for Defendant Ying Kit Yu a/k/a Eddie
19		Yu
20	A TTADNEY A TTEST A TIAN	
21	<u>ATTORNEY ATTESTATION</u>	
22	I hereby attest that the concurrence in the filing of this document has been obtained from	
23	the signatory indicated by a "conformed" signature (/s/) within this e-filed document.	
24		
25		/s/ Jennifer D. Brandt Jennifer D. Brandt, Esq.
		-
26		
27		
28		
	CTIDI II ATION TO EVE	2 FND FACT DISCOVERY DEADLINE

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

- 1. All non-expert discovery shall be completed by September 30, 2011.
- 2. All other dates set pursuant to the Court's Further Case Management and Pretrial

Order of May 17, 2011 shall remain in place.

Dated: _______

